

CASE NO. 201885557

LOADMASTER UNIVERSAL RIGS,  
INC., LOADMASTER DRILLING  
TECHNOLOGIES, LLC and KENNEDY  
FABRICATING LLC,

v.

PETROLEOS MEXICANOS, PEMEX  
EXPLORACION Y PRODUCCION,  
PEMEX PERFORACION Y SERVICIOS  
and PEMEX PROCUREMENT  
INTERNATIONAL, INC.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

61ST JUDICIAL DISTRICT

### **MOTION TO APPOINT INTERNATIONAL PROCESS SERVER**

Plaintiffs Loadmaster Universal Rigs, Inc., Loadmaster Drilling Technologies, LLC and Kennedy Fabricating LLC, respectfully move the Court pursuant to Chapter 1, Article 3 of the Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters developed at the Tenth Session of the Hague Conference on Private International Law on November 15, 1965 (the “Hague Convention”), to appoint Crown Foreign Services, 1020 SW Taylor Street, Suite 240, Portland, Oregon, 97205 and its agents, as the authority and judicial officer competent under the Jurisdiction of this Court to forward to the Central Authority in the applicable country, any and all documents to be served in this case.

A translated copy of the order will accompany all service documents to Mexico.

Dated: March 15, 2019.

YETTER COLEMAN LLP

By: /s/ Bryce L. Callahan

R. Paul Yetter

State Bar No. 22154200

pyetter@yettercoleman.com

Collin J. Cox

State Bar No. 24031977

ccox@yettercoleman.com

Bryce L. Callahan

State Bar No. 24055248

bcallahan@yettercoleman.com

Emma Westbrook Perry

State Bar No. 24102351

eperry@yettercoleman.com

YETTER COLEMAN LLP

811 Main Street, Suite 4100

Houston, Texas 77002

(713) 632-8000

ATTORNEYS FOR PLAINTIFFS

LOADMASTER UNIVERSAL RIGS, INC.,

LOADMASTER DRILLING TECHNOLOGIES, LLC,

AND KENNEDY FABRICATING LLC

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 15<sup>th</sup> day of March, 2019, the foregoing was electronically served by electronic filing service on all counsel of record.

/s/ Bryce L. Callahan

Bryce L. Callahan

CAUSE NO. 2018-85557

LOADMASTER UNIVERSAL RIGS, INC.,	§	IN THE DISTRICT COURT OF
LOADMASTER DRILLING	§	
TECHNOLOGIES, LLC, and KENNEDY	§	
FABRICATING LLC	§	
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
PETROLEOS MEXICANOS, PEMEX	§	
EXPLORACION Y PRODUCCION, PEMEX	§	
PERFORACION Y SERVICIOS and PEMEX	§	
PROCUREMENT INTERNATIONAL, INC.	§	61 <sup>ST</sup> JUDICIAL DISTRICT

**ORDER APPOINTING INTERNATIONAL PROCESS SERVER**

Pursuant to Chapter 1, Article 3 of the Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters developed at the Tenth Session of the Hague Conference on Private International Law on 15 November, 1965 (the “Hague Convention”), and for good cause shown, the Court hereby appoints Crowe Foreign Services, 1020 SW Taylor Street, Suite 240, Portland, Oregon, 97205, and its agents, as the authority and judicial officer competent under the Jurisdiction of this Court to forward to the Central Authority in the applicable country, any and all documents to be served in this case.

IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

BY THE COURT:

\_\_\_\_\_